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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN LIGE, an individual,

Plaintiff,

vs.

CLARK COUNTY, a political subdivision of
the State of Nevada; DOES I-V; and ROES
VI-X,

Defendants.

Case No: 2:16-cv-00603-JAD-(PAL)

**STIPULATION AND ORDER
TO
EXTEND DEADLINE
TO
FILE JOINT PRETRIAL ORDER
[FIRST REQUEST]**

Plaintiff John Lige, by and through his attorney of record, Dan M. Winder, Esq. of the Law Office of Dan M. Winder, P.C., and Defendant Clark County, by and through its attorney of record, Danielle C. Miller, Esq. of Lewis Brisbois Biggaard & Smith, hereby stipulate and agree:

1. The Joint-Pretrial Order in this matter is to be filed by up to and including Monday, Monday, April 23, 2018.

1 The reasons for this request are the following:

- 2 1. This matter has been referred to a mandatory settlement conference, scheduled for
3 April 11, 2018 (ECF No. 120). As this matter concerns thousands of pages of
4 evidence (including 10 deposition transcripts), even the Confidential Settlement
5 Brief, due April 4, 2018, will require several days for preparation.
- 6 2. Plaintiff hopes to make the most of the mandatory settlement conference in regards to
7 both discussion of settlement and preparation for trial.
- 8 3. This Honorable Court allowed five claims for relief to proceed to trial (ECF No. 119).
9 Prior to the March 20, 2018 deadline, Plaintiff and his counsel are still analyzing the
10 Order Granting In Part Defendant Clark County's Motion for Summary Judgment to
11 determine whether moving to reconsider any part is necessary.
- 12 4. In the last week or so and in the next three weeks, Plaintiff's counsel has been and
13 will be working to meet the at least following inordinate amount of deadlines:
 - 14 a. Opening Brief, Judicial Review, *Hicks v. Clark County Dept. of Family*
15 *Services*, filed 03/05/18, Eighth Judicial District Court, Case No. A-17-
16 759909-J;
 - 17 b. Motion for Leave to File Second Amended Complaint, *Muwwakkil v. CCSD*,
18 filed 03/12/18, Eighth Judicial District Court, Case No. A-17-755222-C;
 - 19 c. Retention of expert and coordination of expert report, initial disclosure
20 deadline 4/02/18, *Muwwakkil v. CCSD*, Eighth Judicial District Court, Case
21 No. A-17-755222-C;
 - 22 d. Retention of expert and coordination of expert report, initial disclosure
23 deadline 3/29/18, jury trial date 09/10/18, *Thorpe v. Mumpower, et. al.*, Eighth
24 Judicial District Court, Case No. A-15-714465-C;
 - 25 e. Confidential ENE Brief, *Guo v. Bottega Veneta, Inc.*, due 3/29/18, Federal
26 District Court of Nevada, Case No. 2:17-cv-2778-MMD-(PAL);
 - 27 f. Preparation of timely outgoing discovery (Interrogatories, Requests for
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Production, and Request for Admissions) in *Santi v. McClure, et al.*, Eighth Judicial District Court, Case No. A-17-756848-C and *Muwwakkil v. CCSD*, Eighth Judicial District Court, Case No. A-17-755222-C.

5. Between now and the current deadline to file the Joint Pretrial Order, March 22, 2018, Plaintiff's counsel is not available to personally prepare the Joint Pretrial Order with Defendant's counsel on March 16, 2018. Plaintiff anticipates the meeting would take at least five hours.
6. Counsel for Defendant has also been working on the following matters, which have and will inhibit the ability to assist in the preparation of the Joint Pretrial Order:
 - a. Early Neutral Evaluation Statement, *Grive v. Clark County, Election Department*, U.S. District Court, Case No. 2:17-cv-03109-JAD-VCF;
 - b. Trial Preparation, *Mankel v. GEICO*, U.S. District Court, Case No. 3:16-cv-00657-HDM-VPC; and
 - c. Discovery in 600 Member Class Action Lawsuit, *Small et al v. University Medical Center of Southern Nevada*, U.S. District Court, 2:13-cv-00298-APG-PAL.
7. With the newly proposed April 23, 2018 Joint Pretrial Order deadline, this Honorable Court would have approximately 330 days in which to set the case for trial within 3 years of the March 17, 2016 date of the filing of the complaint in the instant matter.
8. Due to the complex nature of this case and the time constraints discussed above, the parties seek a one month extension in which to file their Joint Pretrial Order.
9. This stipulation is entered into in good faith and not to cause undue delay.

1 DATED this 15th day of March, 2018.

2 Law Office of Dan M. Winder, P.C.

3 /s/ Kristina Miletovic
4 DAN M. WINDER, ESQ.
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5 KRISTINA MILETOVIC, ESQ.
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6 3507 W. Charleston Blvd.
Las Vegas, NV 89102
7 *Attorneys for Plaintiff*

DATED this 15th day of March, 2018.

Lewis Brisbois Bisgaard & Smith LLP

/s/ Danielle C. Miller
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Attorneys for Defendant Clark County

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10 **ORDER**

11 **IT IS HEREBY ORDERED** the Joint-Pretrial Order in this matter is to be filed by up to
12 and including Monday, April 23, 2018.

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14 **IT IS SO ORDERED** this 20th day of March, 2018.

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16 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

Pursuant to LR 5-1, I hereby certify that I am an employee of the LAW OFFICE OF DAN M. WINDER, P.C., and that on the 15th day of March, 2018, I served the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE JOINT PRETRIAL ORDER [FIRST REQUEST]** on counsel as follows:

E-Service pursuant to LR 5-4:

Robert W. Freeman, Esq.
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/s/ Kristina Miletovic

Employee of the Law Office of Dan M. Winder P.C.